

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

REVERSE MORTGAGE INVESTMENT
TRUST INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-11225 (MFW)
)
) (Jointly Administered)
)
)

**NOTICE OF AGENDA FOR ZOOM HEARING SCHEDULED FOR JANUARY 12, 2023,
AT 10:30 A.M. (PREVAILING EASTERN TIME), BEFORE THE HONORABLE
MARY F. WALRATH, BANKRUPTCY JUDGE, UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF DELAWARE**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE.
COURTCALL WILL NOT BE USED TO DIAL IN.**

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

<https://debuscourts.zoomgov.com/meeting/register/vJltdusrTktGpUfrTTOuN-c6vRsgxQxBG0>

**ALL INTERESTED PARTIES SHOULD BE REGISTERED AND CONNECTED BY
THE HEARING TIME.**

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

RESOLVED MATTERS:

1. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief* [D.I. 21; filed November 30, 2022]

Response/Objection December 28, 2022 at 4:00 p.m.
Deadline:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Reverse Mortgage Investment Trust Inc. (3421); Reverse Mortgage Funding LLC (0209); RMIT Cash Management LLC (6241); RMIT Operating I LLC (1844); and RMIT Operating II LLC (2301). The location of the Debtors' service address for purposes of these cases is: 1455 Broad Street, 2nd Floor, Bloomfield, NJ 07003.

Responses/Objections None.
Received:

Related Documents:

- (i) *Declaration of Tanya Meerovich, Chief Restructuring Officer in Support of Chapter 11 Filings and First Day Motions* [D.I. 45; filed December 1, 2022]
- (ii) *Interim Order (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief* [D.I. 134; entered December 6, 2022]
- (iii) *Omnibus Notice of Second Day Hearing* [D.I. 148; filed December 7, 2022]
- (iv) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (v) *Certificate of No Objection Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief* [D.I. 277; filed December 30, 2022]
- (vi) *Final Order (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief* [D.I. 288; entered January 3, 2023]

Status: An Order has been entered. No hearing is necessary.

2. *Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, Or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, and (III) Establishing Procedures for Determining Adequate Assurance of Payment* [D.I. 22; filed November 30, 2022]

Response/Objection December 28, 2022 at 4:00 p.m.
Deadline:

Responses/Objections None.
Received:

Related Documents:

- (i) *Declaration of Tanya Meerovich, Chief Restructuring Officer in Support of Chapter 11 Filings and First Day Motions* [D.I. 45; filed December 1, 2022]
- (ii) *Interim Order (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, and (III) Establishing Procedures for Determining Adequate Assurance of Payment* [D.I. 120; entered December 5, 2022]
- (iii) *Omnibus Notice of Second Day Hearing* [D.I. 148; filed December 7, 2022]
- (iv) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (v) *Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, and (III) Establishing Procedures for Determining Adequate Assurance of Payment* [D.I. 273; filed December 30, 2022]
- (vi) *Final Order (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, and (III) Establishing Procedures for Determining Adequate Assurance of Payment* [D.I. 286; entered January 3, 2023]

Status: An Order has been entered. No hearing is necessary.

3. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Compensation, Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief* [D.I. 30; filed November 30, 2022]

Response/Objection December 28, 2022 at 4:00 p.m.

Deadline:

Responses/Objections None.

Received:

Related Documents:

- (i) *Declaration of Tanya Meerovich, Chief Restructuring Officer in Support of Chapter 11 Filings and First Day Motions* [D.I. 45; filed December 1, 2022]
- (ii) *Interim Order (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief* [D.I. 121; entered December 5, 2022]
- (iii) *Omnibus Notice of Second Day Hearing* [D.I. 148; filed December 7, 2022]
- (iv) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (v) *Certificate of No Objection Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Compensation, Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief* [D.I. 298; filed January 4, 2023]
- (vi) *Final Order (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief* [D.I. 300; entered January 4, 2023]

Status: An Order has been entered. No hearing is necessary.

4. *Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Sidley Austin LLP as Attorneys for the Debtors and Debtors in Possession Effective as of the Petition Date* [D.I. 233; filed December 15, 2022]

Response/Objection December 29, 2022 at 4:00 p.m.
Deadline:

Responses/Objections Informal comments from the U.S. Trustee.
Received:

Related Documents:

- (i) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (ii) *Supplemental Declaration of Anthony Grossi in Support of the Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Sidley Austin LLP as Attorneys for the Debtors and Debtors in Possession Effective as of the Petition Date* [D.I. 281; filed December 30, 2022]
- (iii) *Certification of Counsel Regarding Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Sidley Austin LLP as Attorneys for the Debtors and Debtors in Possession Effective as of the Petition Date* [D.I. 282; filed December 30, 2022]
- (iv) *Order Authorizing the Retention and Employment of Sidley Austin LLP as Attorneys for the Debtors and Debtors in Possession Effective as of the Petition Date* [D.I. 291; entered January 3, 2023]

Status: An Order has been entered. No hearing is necessary.

5. *Debtors' Application for Entry of an Order Authorizing and Approving the Retention of Benesch, Friedlander, Coplan & Aronoff LLP as Bankruptcy Co-Counsel to the Debtors Nunc Pro Tunc to November 30, 2022* [D.I. 234; filed December 15, 2022]

Response/Objection December 29, 2022 at 4:00 p.m.

Deadline:

Responses/Objections Informal comments from the U.S. Trustee.

Received:

Related Documents:

- (i) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (ii) *Supplemental Declaration of Jennifer R. Hoover in Support of the Debtors' Application to Employ and Retain Benesch, Friedlander, Coplan & Aronoff LLP as Bankruptcy Co-Counsel to the Debtors Nunc Pro Tunc to November 30, 2022* [D.I. 278; filed December 30, 2022]
- (iii) *Certification of Counsel Regarding Debtors' Application for Entry of an Order Authorizing and Approving the Retention of*

Benesch, Friedlander, Coplan & Aronoff LLP as Bankruptcy Co-Counsel to the Debtors Nunc Pro Tunc to November 30, 2022 [D.I. 279; filed December 30, 2022]

- (iv) *Order Authorizing and Approving the Retention of Benesch, Friedlander, Coplan & Aronoff LLP as Bankruptcy Co-Counsel to the Debtors Nunc Pro Tunc to November 30, 2022* [D.I. 289; entered January 3, 2023]
- (v) *Second Supplemental Declaration of Jennifer R. Hoover in Support of the Debtors' Application to Employ and Retain Benesch, Friedlander, Coplan & Aronoff LLP as Bankruptcy Co-Counsel to the Debtors Nunc Pro Tunc to November 30, 2022* [D.I. 296; filed January 4, 2023]

Status: An Order has been entered. No hearing is necessary.

6. *Debtors' Application for Entry of an Order (I) Authorizing the Debtors to Employ and Retain FTI Consulting, Inc. to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel, (II) Designating Tanya Meerovich as Chief Restructuring Officer for the Debtors Effective as of the Petition Date, and (III) Granting Related Relief* [D.I. 235; filed December 15, 2022]

Response/Objection December 29, 2022 at 4:00 p.m.
Deadline:

Responses/Objections Informal comments from the U.S. Trustee.
Received:

Related Documents:

- (i) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (ii) *Supplemental Declaration of Tanya Meerovich in Support of the Debtors' Application for Entry of an Order (I) Authorizing the Debtors to Employ and Retain FTI Consulting, Inc. to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel, (II) Designating Tanya Meerovich as Chief Restructuring Officer for the Debtors Effective as of the Petition Date, and (III) Granting Related Relief* [D.I. 283; filed December 30, 2022]
- (iii) *Certification of Counsel Regarding Debtors' Application for Entry of an Order (I) Authorizing the Debtors to Employ and*

Retain FTI Consulting, Inc. to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel, (II) Designate Tanya Meerovich as Chief Restructuring Officer for the Debtors Effective as of the Petition Date, and (III) Granting Related Relief [D.I. 284; filed December 30, 2022]

- (iv) *Order Authorizing the Debtors to (I) Employ and Retain FTI Consulting, Inc. to Provide the Debtors a Chief Restructuring Officer and Certain Additional Personnel and (II) Designate Tanya Meerovich as Chief Restructuring Officer for the Debtors Effective as of the Petition Date* [D.I. 292; entered January 3, 2023]

Status: An Order has been entered. No hearing is necessary.

7. *Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 257; filed December 22, 2022]

Response/Objection December 29, 2022 at 4:00 p.m.
Deadline:

Responses/Objections None.
Received:

Related Documents:

- (i) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (ii) *Certificate of No Objection Regarding Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 280; filed December 30, 2022]
- (iii) *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [D.I. 290; entered January 3, 2023]

Status: An Order has been entered. No hearing is necessary.

8. *Debtors' Motion For Entry of an Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Setting a Bar Date for the Filing of Proofs of Claim by Governmental Units, (III) Setting a Bar Date for Allowance of Administrative Expense Claims, (IV) Establishing Amended Schedules Bar Date and*

Rejection Damages Bar Date, (V) Approving the Form of and Manner for Filing Proofs of Claim, (VI) Approving Notice of Bar Dates, and (VII) Granting Related Relief [D.I. 260; filed December 22, 2022]

Response/Objection December 29, 2022 at 4:00 p.m.
Deadline:

Responses/Objections Informal comments from the Official Committee of Unsecured
Received: Creditors (the “Committee”).

Related Documents:

- (i) *Notice of Rescheduled Second Day Hearing [D.I. 273; filed December 30, 2022]*
- (ii) *Certification of Counsel Regarding Debtors’ Motion for Entry of an Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Setting a Bar Date for the Filing of Proofs of Claim by Governmental Units, (III) Setting a Bar Date for Allowance of Administrative Expense Claims, (IV) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (V) Approving the Form of and Manner for Filing Proofs of Claim, (VI) Approving Notice of Bar Dates, and (VII) Granting Related Relief [D.I. 285; filed December 30, 2022]*
- (iii) *Order (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(b)(9), (II) Setting a Bar Date for the Filing of Proofs of Claim by Governmental Units, (III) Setting a Bar Date for Allowance of Administrative Expense Claims, (IV) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date, (V) Approving the Form of and Manner for Filing Proofs of Claim, (VI) Approving Notice of Bar Dates, and (VII) Granting Related Relief [D.I. 293; entered January 3, 2023]*

Status: An Order has been entered. No hearing is necessary.

9. *Debtors’ Motion for Entry of an Order (I) Authorizing Rejection of (A) Certain Executory Contracts as of the Petition Date, (B) Unexpired Leases on Nonresidential Real Property as of the Lease Rejection Date, (II) Approving Procedures for Future Rejection of Additional Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [D.I. 262; filed December 22, 2022]*

Response/Objection December 29, 2022 at 4:00 p.m.
Deadline:

Responses/Objections Informal comments from the Committee.
Received:

Related Documents:

- (i) *Declaration of Tanya Meerovich, Chief Restructuring Officer of the Debtors in Support of Debtors' Motion for Entry of an Order (I) Authorizing Rejection of (A) Certain Executory Contracts as of the Petition Date, (B) Unexpired Leases On Nonresidential Real Property as of the Lease Rejection Date, (II) Approving Procedures for Future Rejection of Additional Executory Contracts and Unexpired Leases, and (III) Granting Related Relief* [D.I. 263; filed December 22, 2022]
- (ii) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (iii) *Certification of Counsel Regarding Debtors' Motion for Entry of an Order (I) Authorizing Rejection of (A) Certain Executory Contracts as of the Petition Date, (B) Unexpired Leases on Nonresidential Real Property as of the Lease Rejection Date, (II) Approving Procedures for Future Rejection of Additional Executory Contracts and Unexpired Leases, and (III) Granting Related Relief* [D.I. 295; filed January 3, 2023]
- (iv) *Order (I) Authorizing Rejection of (A) Certain Executory Contracts as of the Petition Date, (B) Unexpired Leases on Nonresidential Real Property as of the Lease Rejection Date, (II) Approving Procedures for Future Rejection of Additional Executory Contracts and Unexpired Leases, and (III) Granting Related Relief* [D.I. 297; entered January 4, 2023]

Status: An Order has been entered. No hearing is necessary.

ADJOURNED MATTERS:

10. *Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105, 361, 362, 363, 364 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Post-Petition Financing, (II) Authorizing the Debtors' Use of Cash Collateral, (III) Granting Adequate Protection, and (IV) Granting Related Relief* [D.I. 78; filed December 5, 2022] (the "Second DIP Motion")

Response/Objection December 28, 2022 at 4:00 p.m.
Deadline:

Responses/Objections
Received:

- (a) *Objection of the Official Committee of Unsecured Creditors to Debtors' Motions to Obtain Post-Petition Financing* [D.I. 274; filed December 30, 2022]

Related Documents:

- (i) *Interim Order (I) Authorizing the Debtors to Obtain Post-Petition Financing; (II) Authorizing Certain Debtors' Use of Cash Collateral; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* [D.I. 115; entered December 5, 2022]
- (ii) *Omnibus Notice of Second Day Hearing* [D.I. 148; filed December 7, 2022]
- (iii) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]

Status: On December 8, 2022, the Second Interim DIP Order was entered, granting interim relief with respect to the Original DIP Motion (each as defined below). Accordingly, the Second DIP Motion has been adjourned to date to be determined.

MATTERS GOING FORWARD:

- 11. *Debtors' Motion for Entry of an Order (I) Extending Time to File (A) Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, and Statements of Financial Affairs and (B) Rule 2015.3 Financial Reports and (II) Waiving Requirements to File Lists of Equity Holders* [D.I. 20; filed November 30, 2022]

Response/Objection December 28, 2022 at 4:00 p.m.
Deadline:

Responses/Objections Informal comments from the U.S. Trustee.
Received:

Related Documents:

- (i) *Declaration of Tanya Meerovich, Chief Restructuring Officer in Support of Chapter 11 Filings and First Day Motions* [D.I. 45; filed December 1, 2022]
- (ii) *Omnibus Notice of Second Day Hearing* [D.I. 148; filed December 7, 2022]
- (iii) *Periodic Report Regarding Value, Operations, and Profitability of Entities in Which the Debtor's Estate Holds a Substantial or Controlling Interest* [D.I. 271; filed December 28, 2022] (the "Bankruptcy Rule 2015.3 Report")
- (iv) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (v) *Statement of Financial Affairs* for Debtor Reverse Mortgage Funding LLC [D.I. 307; filed January 5, 2023]
- (vi) *Statement of Financial Affairs* for Debtor Reverse Mortgage Investment Trust Inc. [D.I. 308; filed January 5, 2023]
- (vii) *Statement of Financial Affairs* for Debtor RMIT Cash Management LLC [D.I. 309; filed January 5, 2023]
- (viii) *Statement of Financial Affairs* for Debtor RMIT Operating I LLC [D.I. 310; filed January 5, 2023]
- (ix) *Statement of Financial Affairs* for Debtor RMIT Operating II LLC [D.I. 311; filed January 5, 2023]
- (x) *Schedules of Assets and Liabilities* for Debtor Reverse Mortgage Funding LLC [D.I. 312; filed January 5, 2023]
- (xi) *Schedules of Assets and Liabilities* for Debtor Reverse Mortgage Investment Trust Inc. [D.I. 313; filed January 5, 2023]
- (xii) *Schedules of Assets and Liabilities* for Debtor RMIT Cash Management LLC [D.I. 314; filed January 5, 2023]
- (xiii) *Schedules of Assets and Liabilities* for Debtor RMIT Operating I LLC [D.I. 315; filed January 5, 2023]
- (xiv) *Schedules of Assets and Liabilities* for Debtor RMIT Operating II LLC [D.I. 316; filed January 5, 2023]

Status: On December 28, 2022, and January 5, 2023, the Debtors filed their Bankruptcy Rule 2015.3 Report, Statements of Financial Affairs and Schedules of Assets and Liabilities. Accordingly, the Debtors intend to withdraw this motion as moot.

12. *Debtors' Motion for Entry of Interim and Final Orders, Pursuant to Sections 105, 361, 362, 363, 364 and 507 of the Bankruptcy Code, (I) Authorizing the Debtors to Obtain Post-Petition Financing, (II) Authorizing the Debtors' Use of Cash Collateral, (III) Granting Adequate Protection, and (IV) Granting Related Relief* [D.I. 46; filed December 2, 2022] (the "Original DIP Motion").

Response/Objection December 28, 2022 at 4:00 p.m.
Deadline:

Responses/Objections
Received:

- (a) *Objection of the Official Committee of Unsecured Creditors to Debtors' Motions to Obtain Post-Petition Financing* [D.I. 274; filed December 30, 2022]

Related Documents:

- (i) *Second Interim Order (I) Authorizing the Debtors to Obtain Post-Petition Financing; (II) Authorizing Certain Debtors' Use of Cash Collateral; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* [D.I. 170; entered December 8, 2022] (the "Second Interim DIP Order")
- (ii) *Notice of Filing of Corrected Exhibit to Second Interim Order (I) Authorizing the Debtors to Obtain Post-Petition Financing; (II) Authorizing Certain Debtors' Use of Cash Collateral; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* [D.I. 171; filed December 8, 2022]
- (iii) *Notice of Filing of Exhibit to Second Interim Order (I) Authorizing the Debtors to Obtain Post-Petition Financing; (II) Authorizing Certain Debtors' Use of Cash Collateral; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief* [D.I. 172; filed December 9, 2022]
- (iv) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed

December 30, 2022]

- (v) *Certification of Counsel Regarding Stipulation to Extend Remedies Notice Period to January 13, 2023* [D.I. 276; filed December 30, 2022]
- (vi) *Order Approving the Stipulation to Extend Remedies Notice Period to January 13, 2023* [D.I. 287; entered January 3, 2023].
- (vii) *Debtors' Reply in Support of (I) Motion for DIP Financing and Continued Use of Cash Collateral and (II) Motion for Authority to Continue Honoring Reverse Issuer and Servicing Obligations and Sell Certain Newly Originated Loans* [D.I. 324; filed January 9, 2023]

Status: This matter is going forward.

13. *Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Post-Petition Intercompany Balances, and (III) Granting Related Relief* [D.I. 25; filed November 30, 2022]

Response/Objection December 28, 2022 at 4:00 p.m.
Deadline:

Responses/Objections Received: Informal comments from the U.S. Trustee; Nomura Corporate Funding Americas, LLC and Nomura Securities International, Inc. (collectively, "Nomura"); Credit Suisse First Boston Mortgage Capital LLC, Credit Suisse Securities (USA) LLC, Credit Suisse AG, Cayman Islands Branch, and Alpine Securitization LTD (collectively, "Credit Suisse"); Barclays Bank PLC ("Barclays"); TIAA, FSB ("TIAA"); the Committee; Texas Capital Bank ("Texas Capital"); and Federal National Mortgage Association ("Fannie Mae").

Related Documents:

- (i) *Declaration of Tanya Meerovich, Chief Restructuring Officer in Support of Chapter 11 Filings and First Day Motions* [D.I. 45; filed December 1, 2022]
- (ii) *Interim Order (I) Authorizing the Debtors to (A) Continue to*

Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms and (D) Continue to Perform Intercompany Transactions, (II) Granting Administrative Expense Status to Post-Petition Intercompany Balances, and (III) Granting Related Relief [D.I. 116; entered December 5, 2022]

(iii) *Omnibus Notice of Second Day Hearing* [D.I. 148; filed December 7, 2022]

(iv) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]

Status: This matter is going forward.

14. *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Their Obligations Under Pre-petition Insurance Policies, (B) Continue to Pay Certain Brokerage Fees, (C) Renew, Supplement, Modify, or Purchase Insurance Coverage, (D) Maintain Their Surety Bond Program, and (E) Enter into New Financing Agreements in the Ordinary Course of Business and (II) Granting Related Relief* [D.I. 31; filed November 30, 2022]

Response/Objection December 28, 2022 at 4:00 p.m.
Deadline:

Responses/Objections
Received:

- (a) *Objection of Platte River Insurance Company and Hartford Fire Insurance Company to the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue Their Surety Bond Program and Pay All Obligations in Respect Thereof, (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief* [D.I. 269; filed December 28, 2022]

Related Documents:

- (i) *Declaration of Tanya Meerovich, Chief Restructuring Officer in Support of Chapter 11 Filings and First Day Motions* [D.I. 45; filed December 1, 2022]
- (ii) *Interim Order (I) Authorizing the Debtors to (A) Pay Their Obligations Under Pre-Petition Insurance Policies, (B) Continue to Pay Certain Brokerage Fees, (C) Renew, Supplement, Modify,*

or Purchase Insurance Coverage, (D) Maintain Their Surety Bond Program, and (E) Enter Into New Financing Agreements in the Ordinary Course of Business and (II) Granting Related Relief [D.I. 129; entered December 5, 2022]

- (iii) *Omnibus Notice of Second Day Hearing* [D.I. 148; filed December 7, 2022]
- (iv) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]

Status: This matter is going forward.

15. *Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to (I) Continue Honoring Reverse Issuer and Servicing Obligations and (II) Sell Certain Newly Originated Loans, (B) Modifying the Automatic Stay on a Limited Basis to Facilitate the Debtors' Ongoing Obligations, and (C) Granting Related Relief* [D.I. 44; filed December 1, 2022]

Response/Objection December 28, 2022 at 4:00 p.m.
Deadline:

Responses/Objections
Received:

- (a) *Limited Objection and Reservation of Rights of Deutsche Bank National Trust Company to Debtors' Motion for Entry of a Final Order (A) Authorizing the Debtors to (I) Continue Honoring Reverse Issuer and Servicing Obligations and (II) Sell Certain Newly Originated Loans, (B) Modifying the Automatic Stay on a Limited Basis to Facilitate the Debtors' Ongoing Obligations, and (C) Granting Related Relief* [D.I. 268; filed December 28, 2022]
- (b) *Limited Objection and Reservation of Rights of Leadenhall Life Insurance Linked Investments Fund PLC and Leadenhall Capital Partners LLP to Debtors' Motion for Entry of a Final Order (A) Authorizing the Debtors to (I) Continue Honoring Reverse Issuer and Servicing Obligations and (II) Sell Certain Newly Originated Loans, (B) Modifying the Automatic Stay on a Limited Basis to Facilitate the Debtors' Ongoing Obligations, and (C) Granting Related Relief* [D.I. 272; filed December 29, 2022]
- (c) Informal comments from Nomura, Credit Suisse, Barclays, TIAA, the Committee, Fannie Mae, and U.S. Bank Trust

Company, National Association (“U.S. Bank”).

Related Documents:

- (i) *Declaration of Tanya Meerovich, Chief Restructuring Officer in Support of Chapter 11 Filings and First Day Motions* [D.I. 45; filed December 1, 2022]
- (ii) *Interim Order (A) Authorizing the Debtors to (I) Continue Honoring Reverse Issuer and Servicing Obligations and (II) Sell Certain Newly Originated Loans, (B) Modifying the Automatic Stay on a Limited Basis to Facilitate the Debtors’ Ongoing Obligations, and (C) Granting Related Relief* [D.I. 117; filed December 5, 2022]
- (iii) *Omnibus Notice of Second Day Hearing* [D.I. 148; filed December 7, 2022]
- (iv) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]
- (v) *Debtors’ Reply in Support of (I) Motion for DIP Financing and Continued Use of Cash Collateral and (II) Motion for Authority to Continue Honoring Reverse Issuer and Servicing Obligations and Sell Certain Newly Originated Loans* [D.I. 324; filed January 9, 2023]

Status: This matter is going forward.

16. *Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief* [D.I. 232; filed December 15, 2022]

Response/Objection December 29, 2022 at 4:00 p.m.

Deadline:

Responses/Objections Informal comments from the U.S. Trustee.

Received:

Related Documents:

- (i) *Notice of Rescheduled Second Day Hearing* [D.I. 273; filed December 30, 2022]

Status: This matter is going forward.

17. *Debtors' Motion to Enforce the Order (I) Authorizing Debtors to Enter Into Stipulation to Transfer Servicing and Approving the Terms Thereof; (II) Authorizing Debtors to Take All Actions to Facilitate Transfer of Certain Servicing Rights and Obligations; (III) Approving Procedures for the Debtors' Potential Assumption and Assignment of Executory Contracts and Unexpired Leases; (IV) Modifying the Automatic Stay on a Limited Basis; and (V) Granting Related Relief* [D.I. 318; filed January 6, 2023]

Response/Objection January 11, 2023 at 12:00 p.m.

Deadline:

Responses/Objections

Received:

- (a) *Objection of Leadenhall Life Insurance Linked Investments Fund PLC and Leadenhall Capital Partners LLP to Debtors' Motion for Entry of an Order Pursuant to Bankruptcy Rule 9006(c) and Local Rule 9006-1(e) Shortening the Notice Period for Debtors' Motion to Enforce the Order (I) Authorizing Debtors to Enter into Stipulation to Transfer Servicing and Approving the Terms Thereof; (II) Authorizing Debtors to Take All Actions to Facilitate Transfer of Certain Servicing Rights and Obligations; (III) Approving Procedures for the Debtors' Potential Assumption and Assignment of Executory Contracts and Unexpired Leases; (IV) Modifying the Automatic Stay on a Limited Basis; and (V) Granting Related Relief* [D.I. 321; filed January 9, 2023]

Related Documents:

- (i) *Order (I) Authorizing Debtors to Enter Into Stipulation to Transfer Servicing and Approving the Terms Thereof; (II) Authorizing Debtors to Take All Actions to Facilitate Transfer of Certain Servicing Rights and Obligations; (III) Approving Procedures for the Debtors' Potential Assumption and Assignment of Executory Contracts and Unexpired Leases; (IV) Modifying the Automatic Stay on a Limited Basis; and (V) Granting Related Relief* [D.I. 217; entered December 15, 2022]
- (ii) *Declaration of Tanya Meerovich, Chief Restructuring Officer of the Debtors in Support of Debtors' Motion to Enforce the Order (I) Authorizing Debtors to Enter Into Stipulation to Transfer Servicing and Approving the Terms Thereof; (II) Authorizing Debtors to Take All Actions to Facilitate Transfer of Certain Servicing Rights and Obligations; (III) Approving Procedures*

for the Debtors' Potential Assumption and Assignment of Executory Contracts and Unexpired Leases; (IV) Modifying the Automatic Stay on a Limited Basis; and (V) Granting Related Relief [D.I. 319; filed January 6, 2023]

- (iii) *Debtors' Motion for Entry of an Order Pursuant to Bankruptcy Rule 9006(c) and Local Rule 9006-1(e) Shortening the Notice Period for Debtors' Motion to Enforce the Order (I) Authorizing Debtors to Enter Into Stipulation to Transfer Servicing and Approving the Terms Thereof; (II) Authorizing Debtors to Take All Actions to Facilitate Transfer of Certain Servicing Rights and Obligations; (III) Approving Procedures for the Debtors Potential Assumption and Assignment of Executory Contracts and Unexpired Leases; (IV) Modifying the Automatic Stay on a Limited Basis; and (V) Granting Related Relief* [D.I. 320; filed January 6, 2023]
- (iv) *Order Pursuant to Bankruptcy Rule 9006(c) and Local Rule 9006-1(e) Shortening the Notice Period for Debtors' Motion to Enforce the Order (I) Authorizing Debtors to Enter Into Stipulation to Transfer Servicing and Approving the Terms Thereof; (II) Authorizing Debtors to Take All Actions to Facilitate Transfer of Certain Servicing Rights and Obligations; (III) Approving Procedures for the Debtors Potential Assumption and Assignment of Executory Contracts and Unexpired Leases; (IV) Modifying the Automatic Stay on a Limited Basis; and (V) Granting Related Relief* [D.I. 323; entered January 9, 2023]
- (v) *Notice of Hearing on Debtors' Motion to Enforce the Order (I) Authorizing Debtors to Enter into Stipulation to Transfer Servicing and Approving the Terms Thereof; (II) Authorizing Debtors to Take All Actions to Facilitate Transfer of Certain Servicing Rights and Obligations; (III) Approving Procedures for the Debtors' Potential Assumption and Assignment of Executory Contracts and Unexpired Leases; (IV) Modifying the Automatic Stay on a Limited Basis; and (V) Granting Related Relief* [D.I. 325; filed January 9, 2023]

Status:

This matter is going forward.

[Signature block on following page]

Dated: January 10, 2023
Wilmington, Delaware

Respectfully submitted,

**BENESCH, FRIEDLANDER, COPLAN
& ARONOFF LLP**

/s/ Kevin M. Capuzzi

Michael J. Barrie (DE No. 4684)
Jennifer R. Hoover (DE No. 5111)
Kevin M. Capuzzi (DE No. 5462)
John C. Gentile (DE No. 6159)
1313 North Market Street, Suite 1201
Wilmington, DE 19801
Telephone: (302) 442-7010
Facsimile: (302) 442-7012
E-mail: mbarrie@beneschlaw.com
jhoover@beneschlaw.com
kcapuzzi@beneschlaw.com
jgentile@beneschlaw.com

-and-

SIDLEY AUSTIN LLP

Stephen E. Hessler (admitted *pro hac vice*)
Thomas Califano (admitted *pro hac vice*)
Anthony Grossi (admitted *pro hac vice*)
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 839-5300
Facsimile: (212) 839-5599
Email: shessler@sidley.com
tom.califano@sidley.com
agrossi@sidley.com

Counsel to the Debtors